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Attorneys for Defendants
CITY OF SANTA CLARA, MIKE HORN,
NATHAN CRESCINI, JOSH HIGGINS,
FRANK HAGG, and TROY CARDIN

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO

A. C., a minor, by and through his Guardian) Case No.: C13-3276 HSG (NC)
Ad Litem, MARK CALHOUN,)

Plaintiff,)

vs.)

CITY OF SANTA CLARA, a municipal)
corporation; MIKE HORN, individually and in)
his official capacities as a police officer for the)
CITY OF SANTA CLARA Police Department;)
NATHAN CRESCINI, individually and in his)
official capacities as a police officer for the)
CITY OF SANTA CLARA Police Department;)
JOSH HIGGINS, individually and in his official)
capacities as a police officer for the CITY OF)
SANTA CLARA Police Department; FRANK)
HAGG, individually and in his official capacities)
as a police officer for the CITY OF SANTA)
CLARA Police Department; TROY CARDIN;)
individually and in his official capacities as a)
police officer for the CITY OF SANTA CLARA)
Police Department; and DOES 1-50, inclusive,,)

Defendant.)

**STIPULATION AND ORDER
EXTENDING EXPERT DISCLOSURE
AND DISCOVERY DEADLINES**

The parties hereto, by and through their respective counsel, hereby stipulate and request that the expert disclosure and discovery deadlines be extended by approximately 35 days, as set forth below. The remainder of the case schedule, including the trial date, is not affected by the requested extension.

The reason for the requested extension is that the Defendants require additional time to

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receive recently discovered medical and mental health records of plaintiff which are relevant to defense expert review and opinion. The undersigned counsel are working cooperatively to obtain the required authorizations from plaintiff, and anticipate that these records will be available within the next 30 days.

This is the second extension requested by the parties in this case.

The parties have agreed upon, and hereby request the Court to adopt, the following new case schedule:

TRIAL DATE: 9/8/2015, at 8:30 a.m.

FINAL PRETRIAL CONFERENCE: 8/11/2015, at 3:00 p.m.

DISPOSITIVE MOTIONS: Last day to be heard 7/2/2015, at 2:00 p.m.
See Civil Local Rules for notice and filing requirements.

NON-EXPERT DISCOVERY CUT-OFF: 4/7/2015

EXPERT REPORTS: Opening reports by 5/19/2015
Rebuttal reports by 6/2/2015

EXPERT DISCOVERY CUT-OFF: 6/19/2015

IT IS SO STIPULATED.

Dated: March 31, 2015

LAW OFFICES OF JOHN L. BURRIS

By: */s/ DeWitt M. Lacy
DeWitt M. Lacy
Attorneys for Plaintiffs
*Mr. Lacy provided his consent that this document be electronically filed

Dated: March 31, 2015

HAAPALA, THOMPSON & ABERN, LLP


By: /s/ Rebecca S. Widen
Rebecca S. Widen
Attorneys for Defendants

ORDER

The Court having considered the parties' stipulation, and good cause appearing, IT IS
HEREBY ORDERED that the current case schedule be extended as requested. The new case
schedule shall be as follows:

TRIAL DATE:	9/8/2015, at 8:30 a.m.
FINAL PRETRIAL CONFERENCE:	8/11/2015, at 3:00 p.m.
DISPOSITIVE MOTIONS:	Last day to be heard 7/2/2015, at 2:00 p.m. See Civil Local Rules for notice and filing requirements.
NON-EXPERT DISCOVERY CUT-OFF:	4/7/2015
EXPERT REPORTS:	Opening reports by 5/19/2015 Rebuttal reports by 6/2/2015
EXPERT DISCOVERY CUT-OFF:	6/19/2015

Dated: April 1, 2015



Hon. Haywood S. Gilliam, Jr.
United States District Judge

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